

201-15572

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



September 3, 2004

Via E-mail and US Mail

Mr. Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastics Additives (RAPA) Panel
HPV Chemical Challenge Program (Program)
Changes in Chemicals Sponsored by the RAPA Panel**

04 SEP - 9 PM 1:14
RECEIVED

Dear Mr. Leavitt:

On November 22, 1999, the RAPA Panel (Panel) of the American Chemistry Council volunteered to serve as an industry consortium under the Program. Additional correspondence concerning the RAPA Panel's commitments were submitted on December 30, 1999, February 1, 2000, November 5, 2001, November 7, 2001, December 18, 2001, December 20, 2002, July 3, 2003, February 5, 2004 and June 14, 2004. Members of the RAPA Panel HPV consortium are: Alco Chemicals; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; and The Lubrizol Corporation.

By this letter, the RAPA Panel informs EPA of the change in status of the two chemicals that constitute the Styrenated Phenols Category: styrenated phenol (CAS number 61788-44-1) and isobutyleneated methylstyrenated phenol (CAS number 68457-74-9).

The RAPA Panel originally included these two chemicals in the Hindered Phenols Category. A test plan and robust summary package for the Hindered Phenols was submitted on December 18, 2001. In response to comments received, the Hindered Phenols Category was reconfigured into two categories and two stand-alone chemicals. One of the newly constituted categories was the Styrenated Phenol Category, for which a revised test plan and robust summaries package was submitted on July 10, 2003. This submission included a plan to perform additional testing on chemicals in the category.

In a letter dated July 1, 2004 Crompton Corporation informed EPA that it no longer imports or produces styrenated phenol (CAS no. 61788-44-1). As Crompton Corporation was the sole US manufacturer of this material, the material should be removed from the Program. Although the second member of Styrenated Phenols Category (isobutyleneated methylstyrenated phenol; CAS no. 68457-74-9) may still be imported or produced in the US, the principle



Responsible Care®

producer(s) do not participate in the RAPA Panel. Therefore, the RAPA Panel will no longer sponsor these two chemicals in the Program and will not undertake additional testing for them.

Table 1 (attached) contains the list of chemicals previously sponsored in the Program by the RAPA Panel, with the two Styrenated Phenol Category chemicals highlighted. Table 2 (attached) is the revised list of chemicals currently sponsored in the Program by the RAPA Panel.

Comments received from EPA and the public so far have generally agreed that the RAPA chemicals have a robust set of existing data, reflecting the high level of understanding of potential hazards.

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

Table 1
Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel as of June 14, 2004
Highlighted Chemical was Mistakenly Included as “Sponsored by RAPA.”

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Phenol, styrenated	61788-44-1
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Phenol, isobutylenated methylstyrenated	68457-74-9
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) □erives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
1,4-Benzenediamine, N,N'-mixed Ph and tolyl □erives.	68953-84-4
Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamato)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
1,3,5 Tris(3,5-di-terb-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	27676-62-6

Table 2
Revised List of Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel
as of September 2, 2004

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
1,4-Benzenediamine, N,N'-mixed Ph and tolyl derivatives.	68953-84-4
Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamate)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
1,3,5 Tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	27676-62-6